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**Attorneys for Kyocera Industrial Ceramics Corporation** 

UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF NEW YORK	_ <b>Y</b>	
In re:	- A	
	:	Chapter 11
DELPHI CORPORATION, <u>et al.</u> ,	:	Case No. 05-44481 (RDD)
Debtors.	: : : : :	(Jointly Administered)
	- X	

## LIMITED OBJECTION OF CREDITOR KYOCERA INDUSTRIAL CERAMICS CORPORATION TO DEBTORS' CLAIM OBJECTION AND ESTIMATION PROCEDURES MOTION

Creditor Kyocera Industrial Ceramics Corporation ("KICC"), by and through its undersigned counsel Loeb & Loeb LLP, hereby submits its limited objection (the "Objection") to the above-captioned debtors' (the "Debtors") claim objection and estimation procedures motion dated October 31, 2006 (docket number 5453) (the "Motion"). In support of its Objection, KICC respectfully represents as follows:

1. On July 28, 2006, KICC filed its proof of claim (claim number 12530) (the "Proof of Claim") in these cases, asserting that Debtor Delphi Automotive Systems LLC is indebted to it in the amount of no less than \$312,610.00. The Debtors have objected to KICC's proof of claim in their third omnibus claim objection. <sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Contemporaneously herewith, KICC has filed a response to such claim objection.

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2. KICC does not object to the Motion in principle. However, the Motion proposes

that all creditors holding Contested Claims<sup>2</sup> in excess of \$250,000.00 be required to attend at

least two sets of mandatory in-person meetings in Troy, Michigan – the Meet and Confers and

the Mediations. KICC believes that requiring in-person meetings would be unduly burdensome

and costly for creditors that have asserted relatively small claims (such as KICC).

3. Therefore, KICC proposes that all creditors holding Contested Claims that do not

exceed \$1,000,000.00 be permitted to attend any mandatory Meet and Confers, Mediations or

other meetings telephonically.

WHEREFORE, KICC respectfully requests that this Court: (i) (A) deny the Motion; or

(B) permit creditors holding Contested Claims that do not exceed \$1,000,000.00 to attend any

mandatory Meet and Confers, Mediations or other meetings telephonically; and (ii) grant such

other and further relief as is just and proper.

Dated: New York, New York

November 22, 2006

LOEB & LOEB LLP

By:

/s/ William M. Hawkins

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Attorneys for Kyocera Industrial

**Ceramics Corporation** 

All capitalized terms not otherwise defined herein shall have the meanings ascribed to

them in the Motion.

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